

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

RICHARD FRANCIS, WESLEY WON,
DENNIS SPEERLY, JOSEPH SIERCHIO,
MICHAEL PLAFKER, HOWARD YOUNG,
and DARRIN DEGRAND, individually and
on behalf of others similarly situated,

Plaintiffs,

v.

GENERAL MOTORS, LLC,

Defendant.

KEITH SHELTON, KAREN SHELTON,
DANIEL DRAIN, WAVERS SMITH,
RICHARD FREEMAN, SAMUEL FORD,
KEITH FENSKE, COLTON KELLY, and
CHRISTOPHER GILES, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

GENERAL MOTORS, LLC,

Defendant.

LOUIS RAY, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

GENERAL MOTORS, LLC,

Defendant.

Case No. 2:19-cv-11044

Hon. David M. Lawson

Magistrate Judge David R. Grand

Class Action

Case No. 2:19-cv-11802

Hon. David M. Lawson

Magistrate Judge David R. Grand

Class Action

Case No. 2:19-cv-11808

Hon. David M. Lawson

Magistrate Judge Stephanie
Dawkins Davis

Class Action

DENNIS DUFFY, and RICHARD
SULLIVAN, individually and on behalf of
others similarly situated,

Case No. 9:19-CV-11875

Plaintiffs,
v.

Hon. David M. Lawson

GENERAL MOTORS, INC.,

Magistrate Judge David R. Grand

Defendant.

Class Action

**PLAINTIFFS' SUBMISSION IN SUPPORT OF UNOPPOSED MOTION
FOR APPOINTMENT OF PROPOSED LEADERSHIP STRUCTURE**

Pursuant to this Court's instructions on the September 11, 2019 Hearing, below are the individuals seeking leadership positions as set forth in its Fed. R. Civ. P. 23(g) filing dated August 9, 2019 (ECF No. 26).

Lead Counsel:

Theodore J. Leopold, with the law firm Cohen Milstein Sellers & Toll, PLLC

Steering committee:

1. Russell Paul, with the law firm Berger Montague P.C.
2. Melissa L. Troutner, with the law firm Kessler Topaz Meltzer & Check, LLP
3. Mark Ozzello, with the law firm Capstone Law APC
4. E. Powell Miller, with the law firm The Miller Law Firm, P.C.
5. Steven Calamus, with the law firm Gordon & Partners, P.A.

Liaison Counsel

Michael Pitt, with the law firm Pitt McGehee Palmer & Rivers P.C.

Dated: September 12, 2019

Respectfully submitted,

By: /s/ Michael L. Pitt
Michael L. Pitt (P24429)
Beth Rivers (P33614)
**PITT McGEHEE PALMER
& RIVERS, P.C.**
117 W. Fourth Street, Suite 200
Royal Oak, MI 48067
Telephone: (248) 398-9800
Facsimile: (248) 268-7996
mpitt@pittlawpc.com
brivers@pittlawpc.com

Theodore J. Leopold
**COHEN MILSTEIN
SELLERS & TOLL PLLC**
2925 PGA Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Telephone: (561) 515-1400
Facsimile: (561) 515-1401
tleopold@cohenmilstein.com

Andrew N. Friedman
Douglas J. McNamara
Julia A. Horwitz
Karina G. Puttiveva
**COHEN MILSTEIN
SELLERS & TOLL PLLC**
1100 New York Ave. NW East Tower, 5th Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
afriedman@cohenmilstein.com
dmcnamara@cohenmilstein.com
jhorwitz@cohenmilstein.com
kputtiveva@cohenmilstein.com

Robert Gordon, Esq.
Steven Calamus, Esq.
GORDON & PARTNERS, P.A.
4114 Northlake Blvd.,
Palm Beach Gardens, FL 33410
Telephone: (561) 799-5070
Facsimile: (561) 799-4050

Attorneys for Plaintiffs and the Class in
Duffy, et al. v. General Motors, Inc., 19-cv-
11875; and *Francis et al. v. General Motors,*
Inc., Case No. 2:19-cv-11044-DML-DRG

Russell D. Paul
Amey J. Park
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone:(215) 875-3000
Facsimile: (215) 875-4604
rpaul@bm.net
apark@bm.net

Mark A. Ozzello
Tarek H. Zohdy
Cody R. Padgett
Trisha K. Monesi
CAPSTONE LAW APC
1875 Century Park East, Suite 1000
Los Angeles, California 90067
Telephone:(310) 556-4811
Facsimile: (310) 943-0396
Tarek.Zohdy@capstonelawyers.com
Trisha.Monesi@capstonelawyers.com
Cody.Padgett@capstonelawyers.com

Attorneys for Plaintiffs and the Class in *Shelton*
et al. v. General Motors, Case No. 2:19-cv-
11802-SJM-DRG

E. Powell Miller (P39487)
Sharon S. Almonrode (P33938)
William Kalas (P82113)
THE MILLER LAW FIRM, PC
950 West University Drive, Suite 300
Rochester, MI 48307
Telephone: (248) 841-2200
Facsimile: (248) 652-2852
epm@millerlawpc.com
ssa@millerlawpc.com
wk@millerlawpc.com

Joseph H. Meltzer
Melissa L. Troutner
Natalie Lesser
KESSLER TOPAZ
MELTZER & CHECK, LLP
280 King of Prussia Road
Radnor, PA 19087
Tel.: (610) 667-7706
Fax: (610) 667-7056
jmeltzer@ktmc.com
mtroutner@ktmc.com
nlesser@ktmc.com

Attorneys for Plaintiffs and the proposed class in
Ray, et al. v. General Motors, Case No. 2:19-cv-
11808-DML-SDD

CERTIFICATE OF SERVICE

I hereby certify that, on September 12, 2019 I electronically filed the foregoing with the Clerk of the Court using the ECF system which will notify all counsel of record authorized to receive such filings.

/s/Regina Bell